

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

Between July 2018 and November 2021, **DAJUAN TAYLOR** and his co-conspirators stole, altered, and fraudulently negotiated approximately 53 checks, amounting to an attempted loss to the victims of at least \$497,766.80. **TAYLOR** used various social media platforms such as Instagram to recruit both knowing and unknowing individuals with accounts at various banks to negotiate the stolen checks. **TAYLOR** would then use information and paraphernalia associated with the fraudulent transactions to recruit additional bank account holders to further the scheme.

Victim 1: Check 25489

On or about February 2, 2021, a representative for Victim 1, a Maryland-based business, placed check 25489, reflecting a \$300.00 payment amount, in the U.S. mail to refund a customer of Victim 1. On February 25, 2021, **TAYLOR** deposited via an ATM in Reston, VA an altered version of Check 25489, which was altered to reflect a \$13,000.00 payment amount, into an account at Navy Federal Credit Union (NFCU) ending in x3470. Surveillance images captured **TAYLOR** making this deposit. The altered version of Check 25489 was further altered to reflect that it was made payable to Account Holder 1. Account Holder 1 was not the intended recipient customer of Victim 1 and did not have permission to access the funds from Check 25489.

On or about February 25 and February 26, 2021, Account Holder 1's NFCU account was accessed via the internet from internet protocol (IP) address 69.251.17.73 ("the Morris Rd. IP address"). The Morris Rd. IP address was assigned by Comcast, the internet service provider for the physical address located at 1425 Morris Road SE, Apartment 105, Washington, DC 20020 ("the Morris Rd. address").

TAYLOR was found at the Morris Rd. address on the same date Account Holder 1's account was accessed from the Morris Rd. IP address.

On or about February 25, 2021, images depicting altered Check 25489, the deposit receipt for the Check 25489, and Account Holder 1's debit card were posted to **TAYLOR**'s Instagram account.

Victim 2: Check 24126

On or about September 15, 2021, at an NFCU branch in Glenarden, Maryland, an unknown individual deposited check 24126, altered to reflect a payment amount of \$11,262.44 to be drawn

against Victim 2's account, and altered to be payable to Account Holder 2, into an NFCU account ending in x8954 and bearing Account Holder 2's name.

On or about September 22, 2021, **TAYLOR** was captured by surveillance cameras at an NFCU ATM in Clinton, Maryland withdrawing \$1,000.00 from Victim 2's account ending in x8954, using the debit card associated with Account Holder 2's NFCU account.

On or about November 16, 2021, several posts to **TAYLOR**'s Instagram account were observed relating to Check 24126. The posts included the altered version of Check 24126 with several other checks and various debit cards. Additionally, a post was made showing Account Holder 2's debit card, and what appeared to be the ATM deposit confirmation receipt for Check 24126 on September 15, 2021.

Victim 3: Check 3710

On or about October 22, 2021, at a Bank of America (BoA) ATM located in Hyattsville, Maryland, **TAYLOR** deposited check 3710, drawn against Victim 3's account at PNC Bank (PNC), into an account at BOA ending in x2723 and bearing Account Holder 3's name. Check 3710 was altered to reflect a payment amount of \$8,505.86 and to reflect that Account Holder 3 was the intended recipient. Surveillance cameras at BOA captured **TAYLOR** completing the deposit.

On or about November 16, 2022, a post to **TAYLOR**'s Instagram account depicted a BoA debit card and an ATM receipt detailing a check deposit occurring on October 22, 2021 in Hyattsville, Maryland for \$8,505.86. During an interview with law enforcement, Victim 3 confirmed that check 3710 had been stolen and altered. Victim 3 further confirmed that check 3710 had not been originally drafted reflect Account Holder 3's name as the recipient. Victim 3 stated that neither Account Holder 3 nor **TAYLOR** were authorized to possess check 3710 or access any funds that belonged to Victim 3.

Victim 4: Check 3997

On or about October 10, 2021, Victim 4 placed check 3997 in the U.S. mail using the curbside mailbox at their residence in Fairfax Station, Virginia. Check 3997 was originally written to Lehigh University for \$150.00.

On or about October 25, 2021, **TAYLOR** deposited an altered version of Check 3997 in an NFCU ATM in Clinton, Maryland. At the time of the deposit, check 3997 indicated a payment amount of \$9,050.00, and was made payable to Account Holder 4. **TAYLOR** deposited check 3997 into an account ending in x0950 and bearing Account Holder 4's name. Surveillance cameras captured **TAYLOR** completing the deposit.

On or about October 26, 2021, **TAYLOR** was captured by surveillance cameras withdrawing \$1,000.00 from Account Holder 4's account.

On or about November 1, 2021, **TAYLOR** posted several images to his Instagram account, including images displaying the ATM deposit receipt for check 3997 with the debit card bearing Account Holder 4's name used to complete the transaction. Additionally, **TAYLOR** posted an image of the ATM receipt from the \$1,000.00 cash withdrawal occurring on October 26, 2021.

Victim 4 did not give **TAYLOR** permission to possess or alter check 3997. Victim 4 also did not give Account Holder 4 permission to possess or alter check 3997 or to access any funds belonging to Victim 4.

Victim 5: Check 381

In or around February 2021, Victim 5 wrote check 381 to a business for \$10.11. Victim 5 placed check 381 in the U.S. mail using the curbside mailbox at their residence in Fairfax Station, Virginia. On or about November 8, 2021, Victim 5 noticed that check 381 had been fraudulently negotiated against their account at NFCU by an unintended third party.

On or about November 8, 2021, at approximately 1:57 p.m. an unidentified male later identified as **TAYLOR** deposited an altered version of check 381 into an account at NFCU ending in x8430 and bearing Account Holder 5's name at an ATM in Clinton, Maryland. Check 381 had been altered to reflect a \$9,100.11 payment amount. Check 381 had also been altered to reflect that Account Holder 5 was the intended recipient. Surveillance cameras captured images of the unidentified male, who was seen wearing a multi-colored jacket and a skull cap with the letter "D" on it.

On or about November 8, 2021, at approximately 8:20 p.m., **TAYLOR** was observed withdrawing \$220.00 from Account Holder 5's account at an NFCU ATM in Clinton, Maryland. In the surveillance video, **TAYLOR** can be seen wearing the same skull cap and multi-colored jacket previously observed worn by the previously unidentified individual completing the deposit of check 381 earlier that same day.

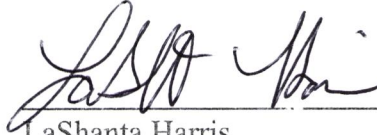
On or about November 8, 2021, at approximately 11:50 p.m., **TAYLOR** withdrew \$780.00 from Account Holder 5's account, using the same NFCU ATM in Clinton, Maryland.

On or about November 9, 2021, at approximately 12:04 a.m., **TAYLOR** withdrew an additional \$1,000.00 from the same NFCU ATM in Clinton. Surveillance cameras captured **TAYLOR** completing the withdrawals while wearing the same clothing observed throughout November 8, 2021, and using what appears to be the same cell phone observed during the previous transactions.

On or about November 16, 2021, a post to **TAYLOR**'s Instagram account showed what appeared to Account Holder 5's debit card and the receipt associated with the deposit of check 381.

At all relevant times during the conspiracy, NFCU and PNC were financial institutions as defined in 18 U.S.C. § 20, and had deposits that were insured by the Federal Deposit Insurance Corporation or the National Credit Union Administration.

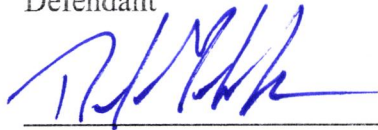
SO STIPULATED:



LaShanta Harris
Assistant United States Attorney

Dajuan Taylor

Dajuan Taylor
Defendant



Daniel Goldman
Counsel for Defendant